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August 18, 2023

## **VIA ECF**

The Honorable J. Brendan Day, U.S.M.J. United States District Court District of New Jersey Clarkson S. Fisher Federal Building & U.S. Courthouse 402 East State Street Trenton, NJ 08608

> Re: Edible IP, LLC et al v. World Media Group, LLC Case No. 3:20-cv-19178-MAS-JBD Joint Letter re. Proposed Schedule

Dear Magistrate Judge Day:

This firm represents Defendant World Media Group, LLC in the above-referenced action. We write jointly with counsel for Plaintiffs to provide proposed schedule as directed in Your Honor's Order of August 11, 2023. Counsel for Plaintiffs reviewed this letter prior to its submission. The parties respectfully request that the current schedule be amended as follows:

## I. <u>Fact Discovery</u>

The close of fact discovery to be extended from July 31, 2023, to November 17, 2023.

## II. Expert Discovery

The deadline for service of affirmative expert reports to be extended from August 31, 2023, to December 22, 2023; the deadline for service of rebuttal expert reports to be extended from September 30, 2023, to January 31, 2024; and the close of expert discovery to be extended from November 15, 2023, to February 29, 2024.

## **III.** Dispositive Motions

Dispositive motions to be filed by April 12, 2024, and returnable by May 6, 2024.

We thank the Court for its continued assistance with this matter.

[SIGNATURE ON FOLLOWING PAGE]

Respectfully submitted,

LERNER DAVID LLP Attorneys for Defendant/Counterclaim Plaintiff World Media Group, LLC

By: s/ Gregg A. Paradise
Gregg A. Paradise

GAP/dmf

cc: All counsel of record